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**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
|--|---|-------------------------------|
| In the Matter of: | : | Docket No. 50-423-LA-3 |
| | : | |
| | : | ASLBP No. 00-771-01-LA |
| Dominion Nuclear Connecticut, Inc. | : | |
| | : | |
| (Millstone Nuclear Power Station, Unit No. 3) | : | November 7, 2001 |

**Intervenors' First Set of Interrogatories and Request for Production in the
Reopened Proceedings Directed to Dominion Nuclear Connecticut, Inc. and
Northeast Nuclear Energy Company**

Introduction

In accordance with the schedule established in the Atomic Safety and Licensing Board panel ("Licensing Board") teleconference call among the parties on October 31, 2001, the Connecticut Coalition Against Millstone ("CCAM") and Long Island Coalition Against Millstone ("CAM")(collectively, "Intervenors") herewith request Northeast Nuclear Energy Company ("NNECO"), formerly licensee of the Millstone Nuclear Power Station, and Dominion Nuclear Connecticut, Inc. ("DNC"), present licensee to: (1) answer their First Set of Interrogatories fully, in writing, and under oath, within 14 days after service of this request pursuant to 10 CFR 2.740b; and (2) produce the documents requested below within 30 days after service of this request pursuant to 10 CFR 2.741(d).

Template = SECY-035

SECY-02

Definition

"Documents" means the complete original or a true, correct and complete copy and any non-identical copies, whether different by reason of any notation or otherwise, of any written or graphic matter of any kind, or any data compilation, no matter how produced, recorded, stored or reproduced (including electronic, mechanical, or electronic records or representation of any kind) including, but not limited to, any writing, letter, telegram, facsimile, meeting minutes, meeting notes, memorandum, statement, computer file, book, record, survey, map, study, handwritten note, working paper, chart, tabulation, graph, tape, data sheet, database, data processing card, printout, microfilm, microfiche, interoffice and intraoffice communications, instructions, reports, demands, schedules, notices, recordings, analyses, sketches, manuals, brochures, telephone minutes, calendars, accounting ledgers, invoices, indices, notebooks, personal notes, diary entries, electronic mail, notes of interview, communication, contracts, any other agreements, data compilations, and all other writings and papers similar to any of the foregoing, however designated by you, including all drafts of all such documents. If the document has been prepared and several copies or additional copies have been made that are not identical (or are no longer identical by reason of the subsequent addition of notations or other modifications), each non-identical copy is to be construed as a separate document.

Request for Interrogatories

1. Please identify each person who supplied information for responding to these Interrogatories and Request for Production. Specifically note the Interrogatories for which each such person supplied information.

2. NRC Office of Investigations Report entitled "Millstone Nuclear Power Station, Unit 1: Failure to Report Missing or Lost Radioactive Fuel Rods in a Timely Manner" ("OI Report") dated September 28, 2001
 - a. Please identify the names, addresses, telephone numbers and business affiliations of all individuals interviewed for the OI Report, their position, and their status as employee or contract worker and, if a contract worker, the name and address of the contractor.
 - b. Please identify all documents requested to be provided to and provided to the Office of Investigations.

3. Assessments of spent fuel pool system issues regarding Millstone Units 1, 2 and 3, either individually or as a group.
 - a. Please identify by title, date and author all reports prepared by the licensee or its contractors concerning such assessments and all draft versions thereof.
 - b. Please identify the name, address, title and business affiliation of all individuals who had access to such assessments.

4. Please identify by date and title all reports of NRC finishing inspections of the fuel storage systems at Millstone Unit 1.

5. Dominion Resources, Inc. ("DRI") and Dominion Nuclear Connecticut, Inc.
 - a. Please state the name and title of all individuals then or subsequently employed by DRI and/or DNC who have been onsite at Millstone in the period of time between January 1, 1995 and December 31, 2000.
 - b. Please state with specificity the nature of the tasks performed by such

individuals.

- d. Please state the name and title of such individuals who had access to Millstone 1 and who participated in, observed or were aware of the fuel inventory identification and reconciliation process.
6. Spent Fuel Project ("SFP")
 - a. Please identify by name and position all individuals assigned to the SFP, including outside consultants, their business affiliation and the location of their companies.
 - b. Please identify by date, title and author all Adverse Condition Reports ("ACRs") generated by the SFP.
 - c. Please identify by name, date and position all management individuals made aware of the ACRs.
 7. Information Submitted to NRC Concerning the Inventory of Spent Fuel at Millstone Unit 1
 - a. Please identify all documents submitted to the U.S. Nuclear Regulatory Commission since September 1, 1972.
 - b. Please identify the names of all individuals involved in preparing and submitting the information to the NRC.
 - c. Please identify the name and department within the NRC to whom such information was submitted.
 8. Please state whether NNECO or DNC has reported any lost, stolen or missing licensed material to the NRC pursuant to 10 CFR Part 20.2201(a)(1)(ii) and, if so, please identify each such report by title, date and author.
 9. Please identify the names and addresses of the members of the Board of Directors of DRI and its predecessor corporate entity during the period of time 1990 to the present time.
 10. Information Shared by NNECO with DRI and DNC
 - a. Please identify what information NNECO shared with DRI and DNC concerning the Millstone Unit 1 spent fuel pool inventory prior to November 16, 2000.

- b. Please identify the dates when such information was shared.
- c. Please identify the names of the individuals involved in the information sharing on the part of NNECO, DRI and DNC.

11. Offsite Facilities

- a. Please identify all correspondence between NNECO and its consultants and contractors in the Fuel Rod Accountability Project with the following facilities:
 - (1) GE facilities in Wilmington, NC, Morris IL, San Jose CA
 - (2) Vallecitos Nuclear Center
 - (3) LLRW storage facilities in Barnwell, SC
 - (4) LLRW storage facilities in Richland, WA
- b. Please identify all correspondence with officials of the states of California, South Carolina and Washington.

12. Please state the complete name of "T.G. Piascik," as referenced in the OI Report at 12, and his (a) dates of employment at Millstone; (b) his present place of employment; and (c) present location.

13. Please provide the name and address of all Unit 1 Reactor Engineers since September 1, 1972.

Request for Production

1. Please produce a copy of all documents identified in Interrogatory 1a.
2. Please produce a copy of all documents identified in Interrogatory 2a.
3. Please produce all reports and draft versions of reports identified in Interrogatory No. 3.
4. Please produce a copy of all documents identified in Interrogatory 5b and all attached or referenced records, reports and correspondence.
5. Please produce a copy of all documents identified in Interrogatory 6a.
6. Please produce a copy of all documents identified in Interrogatory 7.
7. Please produce the documents identified in Interrogatory 10(a) and 10(b).
8. Please produce a copy of the report entitled Northeast Nuclear Energy Company "Independent Assessment of Millstone Unit 1 Spent Fuel Pool System

Issues," prepared by Raytheon Engineers and Constructors ("RE&C") dated April 30, 1997.

10. Please produce a copy of Exhibits 1-40 attached to the OI Report ("List of Exhibits").
11. Please produce a copy of the Fuel Index Card, dated with a May 12, 1979 entry, indicating that the tie rod and spacer capture rod in question are in the northwest corner of the Unit 1 spent fuel pool.
12. Please provide a copy of the subpoena issued by NRC's Office of Investigations to Charles C. Thebaud, Corporate Counsel, Morgan, Lewis and Bockius, LLP.
13. Please produce Carol Mandigo's complete Journal as referenced in OI Report at 10.
13. Please produce Rockwell L. Radasch's complete Calendar/Day Planner as referenced in OI Report at 10.
14. Please produce Michael P. Hills' complete Notes as referenced in OI Report at 10.
15. Please produce the letter written in 1979 by T.G. Piascik, as referenced in the OI Report at 12.
16. Please produce the Kardex file card referenced in the OI Report at 13, paragraph 2.
17. Please produce the Millstone Unit 1 Material Transfer Forms.
18. Please produce the photographs taken during the raised fuel assembly search, as referenced in the OI report at 14.
19. Please produce the photographs taken in November 2000, as referenced in the OI Report at 15.
20. Please produce the draft CR as referenced in the OI report at 25.
21. Please produce the photographs conducted by "Hills and Radasch" as referenced in the OI Report at 28.
22. Please produce all items identified in the "Endnotes" section of the "Fuel Rod Accountability Project" ("FRAP").
23. Please produce all items identified in the "Reference List" section of the FRAP.

24. Please produce the "Internal Communications" identified in the FRAP Appendix.
25. Please produce transcripts of the interviews conducted as referenced in the "Root Cause Investigation" Report at 92-93.
26. Please produce the documents referenced in the "Root Cause Investigation" Report at 94-98.

THE INTERVENORS

By: _____

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**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

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CERTIFICATE OF SERVICE

I hereby certify that copies of the Intervenor's First Set of Interrogatories and Request for Production in the Reopened Proceedings Directed to Dominion Nuclear Connecticut, Inc. and Northeast Nuclear Energy Company have been served on the following by deposit in the U.S. Mail, first class, this 7th day of November, 2001 and emailed on this date as indicated below:

Charles Bechhoefer, Chairman*
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